



# United States Department of the Interior

FISH AND WILDLIFE SERVICE  
Great Swamp National Wildlife Refuge  
241 Pleasant Plains Road  
Basking Ridge, NJ 07920



## **United States Fish and Wildlife Comments on the Draft Baseline Ecological Risk Assessment for the Rolling Knolls Landfill Superfund Site**

Page 1-2, Section 1.1, second sentence: The text suggests that the waste material is surficial as it states that its 0 to 18 feet deep and overlies site soils. Wastes in the areas described are not surficial, but are buried, and should not be confused with the surface debris areas of the site. This sentence should be revised to reflect this.

Page 2-4, Fifth paragraph, first sentence: The text states that most of the site is undisturbed. This statement is false as almost the entire site is disturbed. Please delete this sentence.

Page 3-8, Last paragraph, last sentence: Although it is acknowledged that common landfill practices may have affected the distribution of contaminants at the site, such customs are still related to landfill operations and associated contamination regardless if the source is waster material or not.

Page 3-9, First and second bullets: The text notes that Loantaka and Black Brooks are not hydrologically connected to the landfill. Can such conclusive statements be made with 100% certainty especially given that groundwater flows radially from the landfill? Please confirm that these statements are accurate.

Page 3-11, Second paragraph, first sentence: Groundwater should also be included as a potential source as its been documented that groundwater flows radially form the landfill into the adjoining wetlands.

Page 3-15, Investigation Area table: Please explain how site acreage for individual habitats and total is so large. The landfill is approximately 170 acres. Its understood that some samples were collected outside the landfill boundary, but most were collected within the landfill "footprint".

Page 4-14, Last bullet, Grain Size: Please note the formatting error after the second sentence. It appears a new paragraph is needed afterwards.

Page 4-28, Third and forth bullets: Please revise the text to refer to Figure 4-8. Figure 4-6 depicts aquatic biological sample locations.

Page 4-52: Figure 4-14 is referenced several times on this page; however, there was no such figure provided in the report and appears it was inadvertently excluded.

Page 4-50: Several statements are made suggesting that any “major anthropogenic disturbances” be avoided due to habitat quality or the presence of a single transient State-listed salamander species within areas of known surficial debris and possible site-related contamination. Although not stated, use of such language suggests that in areas such as these, major disturbances such as remedial actions should be avoided. Please delete the above mentioned text as its anticipated that any remedial actions which might occur may further enhance habitat quality especially if restoration of these areas is considered.

Page 5-15, third paragraph: Please delete “mammal” and revise to read “herbivorous bird”.

Page 5-19, Second paragraph: Please delete “soil invertebrates” and revise to read “vegetation” as the assessment endpoint being evaluated is for herbivorous mammals.

Page 6-54, Third paragraph, first sentence: Please revise the text to read “West Pond#1”.

Page 6-55, Third paragraph, second sentence: There should be little concern regarding the amount of time regarding the recruitment of benthic organisms if any disturbances or restoration efforts occur within West Pond 1. It is assumed that most of the benthos inhabiting the pond consists of insect larvae and perhaps some species of snails and other common benthic species. Any concerns related to disturbing benthic communities in the pond should not prohibit any restoration activities which may in fact enhance or improve benthic habitats once completed. If there is any concern, a comprehensive study on benthic communities should be conducted prior to any disturbance activities.

Page 6-55, Last bullet on page: The text states that HQs in general were lower within GSNWR terrestrial habitats relative to those outside of refuge boundaries and thus those habitats outside of the GSNWR were more relevant for RAO development. Although generally speaking, this may be a valid observation, the Refuge is still part of the Site, not as the text suggests, and any RAOs developed would be applicable for areas both inside and outside Refuge boundaries. Furthermore, it is unclear what is trying to be conveyed to the reader regarding the observations of less surficial debris within GSNWR property then outside its boundaries. The amount of debris should be irrelevant in regards to the development of RAOs. In addition it is expected that there is some contamination associated with the surface debris.